

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED v. FORTINET, INC.	Case No. 2:22-cv-00322-JRG-RSP (Lead Case) JURY TRIAL DEMANDED
LIONRA TECHNOLOGIES LIMITED v. CISCO SYSTEMS, INC.	Case No. 2:22-cv-00305-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LIMITED v. HEWLETT PACKARD ENTERPRISE COMPANY, ET AL.	Case No. 2:22-cv-00319-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LIMITED v. PALO ALTO NETWORKS, INC.	Case No. 2:22-cv-00334-JRG-RSP (Member Case)

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO TRANSFER VENUE AND FOR LEAVE
TO TAKE VENUE-RELATED DISCOVERY**

Plaintiff Lionra Technologies Limited (“Lionra”) and Defendants Hewlett Packard Enterprise Company and Aruba Networks, LLC (collectively, “HPE”) file this Joint Motion for Extension of Time to Respond to Defendants’ Motion to Transfer Venue and for Leave to Take Venue-Related Discovery. This Motion is based on the following facts:

1. HPE seeks to transfer this case to the United States District Court for the Eastern District of California pursuant to 28 U.S.C. § 1404(a). Dkt. No. 60.

2. Lionra's response to the Motion to Transfer is presently due December 16, 2022.

3. Having conferred, the Parties have agreed, subject to the Court's approval, to extend the time for Lionra to respond to HPE's Motion to Transfer until February 23, 2023, for HPE to file a reply brief to March 2, 2023, and for Lionra to file a sur-reply until March 9, so that the Parties may conduct discovery on venue-related issues relevant to HPE's Motion to Transfer. This schedule also takes into account the intervening holidays and the increased difficulty in coordinating discovery during shut-down periods among the Parties' business units.

4. The Parties have further agreed that any depositions taken by either side will be limited to venue-related topics, and that should a Party seek a second deposition of any witness, including a Rule 30(b)(6) witness, relating to issues other than venue issues during fact discovery, the Parties will not object to such a second deposition on the basis that the deponent has already been deposed in connection with venue discovery in this case.

5. The Parties have agreed to limit each side's venue discovery to 5 interrogatories, 10 requests for production, and 10 hours of deposition testimony. The venue discovery period shall open on January 2, 2023 and end on February 16, 2023.

6. Lionra has agreed not to argue that the delay resulting from this extension of time supports its opposition to HPE's Motion to Transfer.

7. Accordingly, good cause exists for the Parties' requested extension of time for purposes of taking venue discovery. The Parties seek the requested relief not for the purpose of delay, but in the interests of justice.

WHEREFORE Plaintiff Lionra Technologies Limited and Defendants Hewlett Packard Enterprise Company and Aruba Networks, LLC respectfully seek an Order extending the time for Lionra to respond to HPE's Motion to Transfer until February 23, 2023, for HPE to file a reply brief to March 2, 2023, and for Lionra to file a sur-reply to March 9, 2023, for purposes of allowing the Parties to conduct venue-related discovery.

A proposed order is submitted herewith.

Dated: December 16, 2022

Respectfully submitted,

By: /s/ Brett Cooper

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record on December 16, 2022 via electronic service.

/s/ Brett Cooper
Brett E. Cooper

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Parties complied with the meet and confer requirement in Local Rule CV-7(h) on December 14-16, 2022, and the Parties are in agreement as to this Motion's substance, as indicated by the signatures of counsel for all Parties.

/s/ Brett E. Cooper
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